

PACIFIC GAS AND ELECTRIC COMPANY
Energy Efficiency 2018-2025 Rolling Portfolio Business Plan
Application 17-01-015
Data Response

PG&E Data Request No.:	CCEE_001-Q21		
PG&E File Name:	EnergyEfficiency2018-2025-RollingPortfolioBusinessPlan_DR_CCEE_001-Q21		
Request Date:	March 22, 2017	Requester DR No.:	001
Date Sent:	April 11, 2017	Requesting Party:	California Coalition for Energy Efficiency
		Requester:	Thomas A. Enslow

SUBJECT: APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U338E) FOR APPROVAL OF ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED MATTERS. CCE-DR01

QUESTION 21

In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would “evaluate the impacts associated with implementing targeted hiring goals, prevailing wage and wage floors in the IOUs’ Resource Programs.”¹¹

- (a) What is the status of this evaluation?
- (b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to this evaluation.

ANSWER 21

- a) PG&E’s law department engaged PriceWaterhouse Cooper (PWC) to conduct an informal review of these issues in 2015. PWC conducted an informal review of wages paid to workers in the Energy Savings Assistance Program and three vendors in two of PG&E's third-party / local government partnership direct install subprograms. The review was narrow in that it was limited to four programs or subprograms.

There is no prevailing wage category for workers who install energy efficiency measures. PWC used, instead, the prevailing wage designated by the State of California, Department of Industrial Relations for Light Fixture Maintenance.

Salary levels will vary by geography. The salaries used by PWC in its review are not necessarily reflective of the salaries that may be paid to workers throughout PG&E's vast service territory.

¹¹ Advice Letter, Appendix 2 at p. 5.

The salary information used is not necessarily reflective of salaries paid for work resulting from PG&E's contracts for other energy efficiency programs.

The salary information used was gathered informally and there was no verification of the information provided.

The salary information is confidential market sensitive information provided for a limited purpose. PG&E has no permission from the vendors interviewed to reveal this information. Because PG&E is not authorized to reveal this information, the salary information was redacted from the PowerPoint summary provided in response to subpart b of this question

- b) Pursuant to Rule 10.1 of the CPUC's Rules of Practice and Procedure, PG&E objects to CEE's request to "provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to the evaluation" because the burden, expense or intrusiveness of that discovery clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence

The search for notes, data, draft documents or email related to the study could involve current and former investor-owned utility (IOU) employees, contractors, and consultants over whom PG&E exercises limited or no control. The slim possibility that a search of these documents and emails could lead to an admissible fact does not outweigh the considerable burden of having searching through the workforce and database of four IOUs to locate every item sought by CEE.

Accordingly, PG&E will not provide non-final reports, memorandum, contracts, studies, updates, data, or email. Notwithstanding the foregoing, and without waiving PG&E's right to object to the admissibility of the requested information into evidence, PG&E provides the **attached** PowerPoint summary.

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